GIBSON, DUNN & CRUTCHER LLP

Matthew K. Kelsey Lisa H. Rubin Jeremy L. Graves (admitted *pro hac vice*) 200 Park Avenue New York, New York 10166-0193

Telephone: (212) 351-4000 Facsimile: (212) 351-4035

Attorneys for Banc of America Credit Products, Inc. Merrill Lynch Credit Products, LLC, and Merrill Lynch International

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

LEHMAN BROTHERS HOLDINGS INC., et al.

Debtors.

Chapter 11

Case No. 08-13555 (SCC)

(Jointly Administered)

JOINDER OF BANC OF AMERICA CREDIT PRODUCTS, INC., MERRILL LYNCH CREDIT PRODUCTS, LLC, AND MERRILL LYNCH INTERNATIONAL, TO LIMITED OBJECTION OF BANIA BROTHERS, L.L.C., BAUPOST GROUP SECURITIES, L.L.C., AND WOODERSON PARTNERS, L.L.C. TO THE MOTION OF THE PLAN ADMINISTRATOR IN AID OF EXECUTION OF THE PLAN TO ESTABLISH A BAR DATE FOR DEMANDS FOR POSTPETITION INTEREST AGAINST LEHMAN BROTHERS OTC DERIVATIVES INC.

AND LEHMAN BROTHERS COMMERCIAL CORPORATION

Banc of America Credit Products, Inc. ("BACP"), Merrill Lynch Credit Products, LLC ("Merrill"), and Merrill Lynch International ("MLI," and collectively with BACP and Merrill, "BoA"), hereby submit this joinder in support of the Limited Objection of Bania Brothers, L.L.C., Baupost Group Securities, L.L.C., and Wooderson Partners, L.L.C. to the Motion of the Plan Administrator in Aid of Execution of the Plan to Establish a Bar Date for Demands for Postpetition Interest Against Lehman Brothers OTC Derivatives Inc. and Lehman

Brothers Commercial Corporation (the "*Limited Objection*") [Dkt. No. 47709],¹ and respectfully state as follows:

JOINDER

- BoA holds a substantial amount of Allowed Claims against LOTC arising from the termination of swap transactions arising pursuant to certain ISDA Master Agreements with LOTC.
- 2. BoA agrees with (i) each of the arguments made by the Respondents in the Limited Objection and (ii) the relief requested therein. Accordingly, BoA hereby joins in the Limited Objection for all of the reasons set forth therein.

[Remainder of page intentionally left blank]

All capitalized terms used herein and not otherwise defined shall have the meanings set forth in the Limited Objection.

WHEREFORE, for the reasons stated herein, BoA respectfully joins in the Limited Objection, requests that the Court grant the relief requested in the Limited Objection, and grant such other and further relief as the Court may deem proper and just.

Dated: New York, New York January 7, 2015

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

/s/ Matthew K. Kelsey

Matthew K. Kelsey Lisa H. Rubin Jeremy L. Graves (admitted *pro hac vice*) 200 Park Avenue New York, New York 10166-0193 Telephone: (212) 351-4000 Facsimile: (212) 351-4035

Attorneys for Banc of America Credit Products, Inc. Merrill Lynch Credit Products, LLC, and Merrill Lynch International